

EXHIBIT E

From: [Hunter Shkolnik](#)
To: [Kate Swift](#)
Subject: Re: Opi mdl new witnesses
Date: Thursday, October 3, 2019 10:16:17 AM

Kate

Thanks for your efforts here but we really need a global deal and a cut back on the numbers. Given this impasse I think we should address this with the special master.

Hunter

----- Original message -----

From: Kate Swift <kate.swift@bartlitbeck.com>
Date: 10/3/19 9:38 AM (GMT-05:00)
To: Hunter Shkolnik <Hunter@NapoliLaw.com>
Subject: Re: Opi mdl new witnesses

I have not gotten a clear answer from other defendants on this, and can't speak for them as a group. We may not all be similarly situated. As for the Walgreens witnesses, I believe there are five who have not been deposed. I do not anticipate we will call them all. We may call three of them.

BartlitBeck LLP

Katherine M. Swift | p: [312.494.4405](tel:312.494.4405) | c: 773.531-6118 | Kate.Swift@BartlitBeck.com | Courthouse Place, [54 West Hubbard Street, Chicago, IL 60654](#)

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On Oct 2, 2019, at 2:26 PM, Hunter Shkolnik <Hunter@napolilaw.com> wrote:

Kate

I have two questions:

1. Do the other defendants agree to this procedure?
2. Are you reducing the number of designated witnesses?

Hunter

From: Kate Swift <kate.swift@bartlitbeck.com>
Sent: Wednesday, October 2, 2019 10:28 AM
To: Hunter Shkolnik <Hunter@NapoliLaw.com>
Subject: RE: Opi mdl new witnesses

Hunter,

If plaintiffs agree to put up any un-deposed witnesses they plan to call at trial for deposition, Walgreens will agree to do the same. We will disclose which witnesses no later than one week before they are to testify at trial, and offer them for a 2-hour deposition in the evening or on the weekend in that week. We reserve substantive objections to the testimony of any of plaintiffs' un-deposed witnesses (i.e., objections unrelated to timing of disclosure of the witness).

BartlitBeck LLP

Katherine M. Swift | p: 312.494.4405 | c: 773.531-6118 | Kate.Swift@BartlitBeck.com | Courthouse Place, 54 West Hubbard Street, Chicago, IL 60654

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From: Hunter Shkolnik <Hunter@NapoliLaw.com>

Sent: Tuesday, October 1, 2019 3:42 PM

To: Kate Swift <kate.swift@bartlitbeck.com>

Subject: Opi mdl new witnesses

Kate

We will be cutting 2 of the witnesses

Hunter

Hunter Shkolnik

Partner



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Hunter Shkolnik

Partner



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Hunter Shkolnik

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From: [Hunter Shkolnik](#)
To: [Kate Swift](#)
Subject: Opi mdl new designated witnesses
Date: Thursday, September 26, 2019 9:11:59 AM

Kate

Any news on the option i suggested ?

Hunter

Hunter Shkolnik

Partner



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From: [Hunter Shkolnik](#)
To: [Kate Swift](#)
Subject: Opi mdl witnesses
Date: Tuesday, September 24, 2019 2:49:19 PM

Kate

We are working to cut down witnesses and I'd like to discuss an issue with you. It's very preliminary and I'd like to run something by you before I discuss with my team.

Hunter

Hunter Shkolnik

Partner



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